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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates to Individual Case No.
3:13-cv-02171-SC

Master File No. 3:07-cv-05944-SC (N.D. Cal.)
MDL No. 1917

DELL INC. and DELL PRODUCTS L.P.,

Plaintiffs,

v.

HITACHI, LTD., *et al.*,

Defendants.

Individual Case No. 3:13-cv-02171-SC

**REPLY DECLARATION OF JAMES M.
WAGSTAFFE IN SUPPORT OF
PLAINTIFFS DELL INC. AND DELL
PRODUCTS L.P.'S MOTION FOR
DISCOVERY ORDER AND TO STRIKE
ERRATA**

1 I, **JAMES M WAGSTAFFE**, declare as follows:

2 1. I am a partner with the law firm of Kerr & Wagstaffe LLP, counsel for Plaintiffs Dell
3 Inc. and Dell Products L.P. (collectively, "Dell") in the above-captioned action currently pending in the
4 U.S. District Court for the Northern District of California. I submit this Reply Declaration in support
5 of Dell's Motion for Discovery Order and to Strike Errata. I have personal knowledge of the facts
6 stated herein, and I could and would competently testify thereto if called as a witness.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the deposition
8 transcript of Yasuki Yamamoto, dated July 1-3, 2013.

9 3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the deposition
10 transcript of Jae In Lee, dated July 24-27, 2013.

11 4. I coordinated a review of the deposition transcript of Yasuki Yamamoto. Toshiba's
12 counsel lodged 1,061 objections after the telephonic hearing with Judge Legge.

13 5. I coordinated a review of the deposition transcript of Jae In Lee. Toshiba's counsel
14 lodged 1,263 objections while participating over the phone.

15 I declare under penalty of perjury under the laws of the United States of America that the
16 foregoing is true and correct.

17 Executed on November 5, 2013, in San Francisco, California.

18
19 DATED: November 5, 2013

By: /s/ James M. Wagstaffe

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